

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

November 26, 2019

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees ("PECs"), on behalf of all plaintiffs, write to request a brief two day extension of the two deadlines set in the Court's November 20, 2019 Order, ECF No. 5297, from December 4, 2019 to December 6, 2019. The extension is needed to allow time for an effective meet and confer process with the Department of Justice ("DOJ"), and adequate opportunity for the PECs to confer about and coordinate the relevant submissions.

Due to work conflicts early this week and travel and family commitments surrounding the Thanksgiving holiday, the PECs and DOJ will not have an opportunity to confer until the week of December 2, 2019. That will leave very little time for meaningful dialogue prior to the December 4, 2019 deadline set in the Court's Order for submitting a proposed briefing schedule and summary of the areas of disagreement. These conflicts also leave very little opportunity for the PECs to confer among themselves and coordinate their submission on the witness list.

In order to allow sufficient time for productive dialogue with the DOJ, and for the PECs to confer on relevant submissions, the PECs respectfully request that the deadlines set forth in the Court's Order of November 20, 2019 be extended from December 4, 2019 to December 6, 2019.

The DOJ does not object to the requested extension of the deadline for the PECs' submission relating to the further motion to compel, and the Kingdom of Saudi Arabia does not object to the requested extension of the deadline for the PECs' witness list submission.

The Honorable Sarah Netburn
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We thank Your Honor for the Court's consideration in this matter.

Respectfully submitted,

COZEN O'CONNOR

/s/ Sean P. Carter

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MDL 1570 Plaintiffs' Exec. Committee for
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/s/ Andrew J. Maloney

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MDL 1570 Plaintiffs' Exec. Committee for
Personal Injury and Death Claims

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/s/ Robert T. Haefele

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MDL 1570 Plaintiffs' Exec. Committee for
Personal Injury and Death Claims

cc: All MDL Counsel of Record (via ECF)

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